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September 14, 2020

**Sent via ECF filing system**

Hon. Lorna G. Schofield  
United States District Court, SDNY  
500 Pearl Street  
New York, NY 10007

**RE: *Powers v. Memorial Sloan Kettering Cancer Center, et al.***  
**Docket No. 1:20-cv-02625 SDNY**

Dear Judge Schofield:

This letter is in response to Your Honor's September 8, 2020 order [doc. 48]. The order required Plaintiff to supplement his submission by producing the "requested but withheld employment documents" by September 15, 2020.

Plaintiff's concerns have become moot. In the course of requesting these documents from Ms. Zak's employer, I discovered that her employer only maintained salary information in Ms. Zak's employment file, and no documents that would raise privacy concerns. I have provided defense counsel, Ms. Baydala, with an unrestricted employment records authorization today. She understands that I have done so subject to Plaintiff's reservation that if Ms. Zak's employer subsequently discovers the existence of documents Plaintiff believes raise privacy concerns, we will renew our objection and supplement this response to the Court's Order along with any such documents we believe should be withheld for the Court's review.

Defendants' motion for a conference in anticipation of a motion to compel, and request for unrestricted access to Plaintiff's employment records (Dkt. No. 43), and Plaintiff's objections to Defendants' requests (Dkt. No. 46), are DENIED as moot, without prejudice to renewal.

The Clerk of Court is respectfully requested to close the motion at Dkt. No. 43.

Dated: September 15, 2020  
New York, New York

Very truly yours,  
Hendler Flores Law, PLLC

A handwritten signature in black ink, appearing to read 'Scott M. Hendler', written over a horizontal line.

Scott M. Hendler

A handwritten signature in black ink, appearing to read 'Lorna G. Schofield', written over a horizontal line.

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE